



**KLEINBERG
KAPLAN**

Writer's E-Mail: RTuchman@kkwc.com
Writer's Direct Dial: 212.880.9898

October 28, 2019

Via ECF

Hon. Naomi Reice Buchwald
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 21A
New York, New York 10007-1312

Re: Deborah Donoghue v. Ambase Corp., et al., No. 19-cv-8179

Dear Judge Buchwald:

I write on behalf of IsZo Capital LP, IsZo Capital Management LP, IsZo Capital GP LLC and Brian L. Sheehy, defendants in the above-captioned action (collectively, "IsZo Defendants"), to respectfully request a short extension of time for the IsZo Defendants to respond to the Complaint filed on September 3, 2019 (Dkt. # 1). The Complaint was served on each of the IsZo Defendants between October 8 and 10, 2019. Accordingly, the IsZo Defendants' responses to the Complaint are variously due between October 29 and 31, 2019. The IsZo Defendants respectfully request that the time for each of the IsZo Defendants to respond to the Complaint be extended through and including November 8, 2019. No previous request for this or any similar relief has been made in this action. Plaintiff's counsel has consented to this extension which will not affect any scheduled dates in this matter.

Thank you in advance for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Robert M. Tuchman", with a long horizontal flourish extending to the right.

Robert M. Tuchman

cc: Miriam Tauber (*via ECF*)
David Warburg (*via e-mail*)